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*Attorneys for Defendant Bank of America, N.A.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ROOTA SHIRINYANS

Plaintiff,

vs.

BANK OF AMERICA, N.A., U.S. BANK,  
N.A., CHEXSYSTEMS, INC., EARLY  
WARNING SERVICES, LLC

Defendants.

Case No.: 2:25-cv-00411-GMN-EJY

**JOINT MOTION TO EXTEND TIME  
FOR BANK OF AMERICA, N.A. TO  
FILE RESPONSE TO COMPLAINT  
[FIRST REQUEST]**

Pursuant to Local Rule 7-1 and Local Rule 6-1, Plaintiff Roota Shirinyans (“Plaintiff”) and Defendant Bank of America, N.A. (“BANA”), by and through their respective undersigned counsel of record, submit this Joint Motion and Proposed Order.

IT IS STIPULATED AND AGREED by and between Plaintiff and BANA that the time for BANA to respond to the Complaint in this action is extended to and through May 1, 2025. This is the Parties’ first request for an extension of this deadline.

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1 The Parties request this extension to permit BANA to review the allegations and for  
2 the Parties to discuss a possible early resolution of this case to avoid unnecessary fees and costs.

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4 Dated: April 3, 2025

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6 LAW OFFICE OF KEVIN L. HERNANDEZ

SNELL & WILMER L.L.P.

7 By: /s/ Kevin L. Hernandez  
8 Kevin L. Hernandez, Esq.  
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By: /s/ John S. Delikanakis  
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10 *Attorneys for Plaintiff*

*Attorneys for Defendant Bank of America, N.A.*

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13 **ORDER**

14 **IT IS SO ORDERED.**

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16 UNITED STATES MAGISTRATE JUDGE

17 Dated: April 3, 2025  
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